



DIBENEDETTO
— L A W —

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*ADMITTED IN NY, NJ & DC

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February 18, 2022

VIA ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

APPLICATION GRANTED
SO ORDERED

2/18/22 *John G. Koeltl*
John G. Koeltl, U.S.D.J.

Re: United States v. Wael Hamad, et al.
21 CR 680 (JGK)

Dear Judge Koeltl:

We write to respectfully request a modification of Wael Hamad's bail conditions, which would allow him to stay at his fiancé's apartment overnight while she is in New York.

Hamad was recently engaged on December 11, 2021. His fiancé is a Canadian resident. She is currently in New York until June and plans on returning to New York again in July. Hamad's current bail conditions require him to live with his mother at her residence. The residence is a two-bedroom apartment shared by Hamad's mother and grandmother. Given the lack of space and privacy at his mother's apartment, Hamad's fiancé rented an apartment from a friend in Middle Village, Queens. This apartment preserves Hamad's family's living space and allows sufficient privacy for his fiancé to work remotely.

Hamad would like to spend time with his fiancé at her apartment but was informed by his pretrial officer that he would require permission from the Court if he planned on spending the night. Accordingly, we are respectfully requesting that Hamad be allowed to live with his fiancé while she is in New York.

Hamad's Pretrial Services Officer John Moscato has no objection to this request and the government has deferred to the judgment of Mr. Moscato.

JD

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For the aforementioned reasons, it is respectfully requested that this Court modify Hamad's conditions of bail to allow him to relocate to his fiancé's residence while she is in New York.

Respectfully submitted,

/s/
Joseph DiBenedetto

cc: Government Counsel
Pretrial Services (via email)